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November 19, 2024

BY CM/ECF

Hon. John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

*Re: In re: Kingdom of Belgium, Federal Public Service Finance
Pension Plan Litigation,
Lead Case: 21 Civ. 6392 (JGK)
Member Cases: Nos. 21 Civ. 6399 (JGK); 21 Civ. 6407 (JGK); 21
Civ. 6408 (JGK)*

Dear Judge Koeltl,

Hecker Fink LLP respectfully submits this letter in response to the Court's October 3, 2024 order on the firm's motion to withdraw, directing the parties to advise the Court whether there will be a substitution of counsel for AOI Pension Plan, Rajan Investments LLC Pension Plan, Pleasant Lake Productions Pension Plan, Alden Investments Pension Plan, Jerome L'Hote, Carrick Holdings Pension Plan, Matthew Stein, Ganesha Industries Pension Plan, Mazagran Pension Plan, and Davin Investments Pension Plan (the "Hecker Fink Clients").

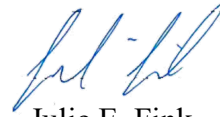
Since the Court issued its October 3 order, we have repeatedly requested that the Hecker Fink Clients confirm their retention of replacement counsel. On October 17, a representative of the Hecker Fink Clients reported that they were working to engage a law firm in this matter that already represents some (if not all) of them in connection with another matter ("Prospective Replacement Counsel"). On October 31, in response to another request for an update, a representative of the Hecker Fink Clients informed us that they were still in discussions with Prospective Replacement Counsel and hoped that Prospective Replacement Counsel would file an appearance at the end of the week of November 4 or early the following week. That target date has come and gone, yet the Hecker Fink Clients still have not confirmed that they have retained Prospective Replacement Counsel, or any other replacement counsel.

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There are several factors that counsel in favor of granting Hecker Fink's withdrawal at this time. As the Court is aware, following the filing of the November 8 reply brief there are no deadlines in the case until January 2025 and the Hecker Fink Clients have consented to our withdrawal. Moreover, substantial issues have arisen in the representation of the Hecker Fink Clients that we believe justify our withdrawal irrespective of the timing of the Hecker Fink Clients' retention of replacement counsel. Should the Court find exposition of those issues helpful, we respectfully request leave to address them in an *ex parte* submission.

Respectfully,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing letter was served on November 19, 2024, to all counsel of record by ECF, and to Defendants Matthew Stein, Jerome Lhôte, Alden Investments Pension Plan, AOI Pension Plan, Carrick Holdings Pension Plan, Davin Investments Pension Plan, Ganesha Industries Pension Plan, Mazagran Pension Plan, Pleasant Lake Productions Pension Plan, and Rajan Investments LLC Pension Plan by email.

/s/ Julie E. Fink

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